

REC'D MAR 18 2025

**IN THE UNITED STATES COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

## **COMPLAINT**

Gordon Roy Parker (“Gordon”), Plaintiff in the above-styled action, submits this Complaint. In support of his claims, he submits the following:

## THE PARTIES

1. Plaintiff Gordon Roy Parker (“Gordon”) is a resident of Philadelphia, domiciled at the Broad Street Ministry, 315 South Broad Street, #0106, Philadelphia, PA 19107. He prefers to be served by and will accept service by e-mail at [Gordonroyparker@gmail.com](mailto:Gordonroyparker@gmail.com) (upon confirmation reply by Plaintiff).
2. The 425 North 41<sup>st</sup> Street defendants are as follows:
  - a. Defendant **PanPhil Realty, LLC** is a Pennsylvania limited-liability corporation which manages a rental property in controversy in this action – 425 North 41<sup>st</sup> Street, Philadelphia, PA 19104 (“425 North 41<sup>st</sup>”) – for Defendant **Xahoxia Wang**. In the course of these duties, they placed the rental

ad in controversy, and engage in tenant screening on behalf of Defendant Wang. They may be served at the above address.

b. Defendant **Xahoxia Wang** is the owner of 425 North 41<sup>st</sup> Street, Philadelphia, PA 19104, and may be served at home at 1316 Virginia Avenue, Havertown, PA 19083.

c. Defendant **Nanxing “Nancy” Wei**, is listed as the agent contact for Defendant PanPhil Realty, and is now employed with the Pennsylvania Housing Development Corporation (“PHDC”):

**Nanxing (Nancy) Wei (She/Her)**  
Associate Program Manager | Real Estate Negotiating

Enhance your own profile by adding a work experience. [Add experience](#) X

**Experience**

**Program Manager**  
Philadelphia Housing Development Corporation - Full-time  
Sep 2022 - Present · 2 yrs 7 mos  
Philadelphia, Pennsylvania, United States

- Support the design, launch, and program management of the Rental Improvement Fund program at PHDC.
- Supervise staff in processing loan applications and supporting documentation to ensure compliance ...see more

**Federal Davis-Bacon Certified Professional and LCPTracker Software Certified Professional**

**Associate Broker**  
Panphil Realty, LLC - Full-time  
Aug 2011 – Aug 2022 · 11 yrs 1 mo  
Philadelphia

- Perform all aspects of the development and capital improvement projects undertaken by the firm and various asset management functions, including asset and portfolio valuation, financial analysis, lease negotiation, tenant relations, and dispositions.
- Oversee the successful completion of over 40+ development and redevelopment projects.
- Sold over \$30 million in residential and commercial properties.
- Performed statistical analysis of the market and improved price bidding success by 30%.
- Led and oversaw a buy/sell team of 5 associates, increasing the company's profit by 10%.
- Supervised junior employees in managing 500+ rental properties in the greater Philadelphia area.
- Supervise leasing team and maintain 95% rent collection on time and 90% high occupancy level.
- Collaborated with construction companies on construction, facility maintenance, and services.
- Engage and coordinate the work between all parties to find workable solutions and achieve deliverable.

**Budgeting, Project Management, Negotiation, Feasibility Studies, Real Estate Development**

**Education**

**Harvard University**  
Sustainable Cities and Communities  
Jan 2023 - Dec 2023

3. The 4024 Spruce Street defendants are as follows:

a. Defendant **Allegiance Real Estate, LLC** is a Pennsylvania limited-liability corporation which manages a rental property in controversy in this action – 4024 Spruce Street, Philadelphia, PA 19104 – for the building’s owner, Defendant 4024 Spruce Street Company, LLC.

b. Defendant **Bryan Reese** is the contact agent for Defendant Allegiance, for the Zillow ad in controversy for 4024 Spruce Street. He may be served at his office at Allegiance.

c. Defendant **4024 Spruce Street Company, LLC** is a Pennsylvania limited-liability corporation which owns 4024 Spruce Street (“4024 Spruce”), where they may be served.

4. Defendant **Greenzang Properties III, LLC** (not to be confused with Greenzang Properties I, II, IV, V, VI, VII, VIII, IX, X, XI, and XII) is a domestic limited-liability corporation headquartered in Pennsylvania. They may be served at 2015 Locust Street, Suite 100, Philadelphia, PA 19103.

5. Defendant **Anchor Real Estate** is the owner of 4222 Baltimore Avenue, Philadelphia, PA, 10104 and may be served at its offices at 2001 Market Street, #2522, Philadelphia, PA 19103.

6. Defendant **New Horizons West I LP d/b/a New Horizons Housing** is a Pennsylvania Limited Partnership, which may be served at 4101 Baltimore Avenue, Philadelphia, PA 19104. Defendant **Brittney Knox** is the contact agent for Defendant New Horizons, and may be served at their office.

7. Defendant **AMC Delancey Group Inc., d/b/a Delancey Verona Plaza, LLC** is a Pennsylvania corporation which manages The Verona, 4715 Walnut Street, Philadelphia, PA, and may be served at their offices at 718 Arch Street, #400N, Philadelphia, PA 19106.

8. Defendant **2045 Walnut Street Associates** is a Pennsylvania Corporation who owns and manages 2045 Walnut Street, Philadelphia, PA 19103, and may be served at that address.

9. Defendant **Vihi Realty** is a Pennsylvania Corporation who owns/manages 5414 Osage Avenue. They are may be served at their offices at 1519 W. Passyunk Ave., Philadelphia, PA 19145.

10. Defendant **Susan Donato** is a resident of Pennsylvania and the owner of 227 South 44<sup>th</sup> Street, Philadelphia, PA 19104, where she may be served.

11. Defendant **Kitov Realty, LLC** is a Pennsylvania limited-liability corporation and the owner of 223 West Seymour Street, Philadelphia, PA 19144.

12. Defendant **Zillow Group, Inc.** (Z:NASDAQ) is a publicly traded company and real estate marketplace, including rental-property sales and leases. The are actively engaged with landlords, tenants, and residential properties)

### NATURE OF ACTION

13. This is an action rooted in multiple violations of the Fair Housing Act, and, via supplemental jurisdiction, the Renters Access Act of 2019, related to three ads placed on Zillow in March, 2025.

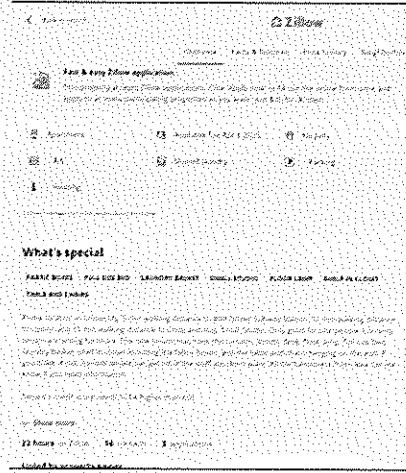
## **STATEMENT OF JURISDICTION AND VENUE**

14. Jurisdiction is proper under 28 USC §1331, because of the existence of federal questions related to the Fair Housing Act. Supplemental jurisdiction over the state law claims is also proper.

15. Venue in this district is proper because all Defendants either reside, are domiciled, or conduct business within the district and/or the Commonwealth.

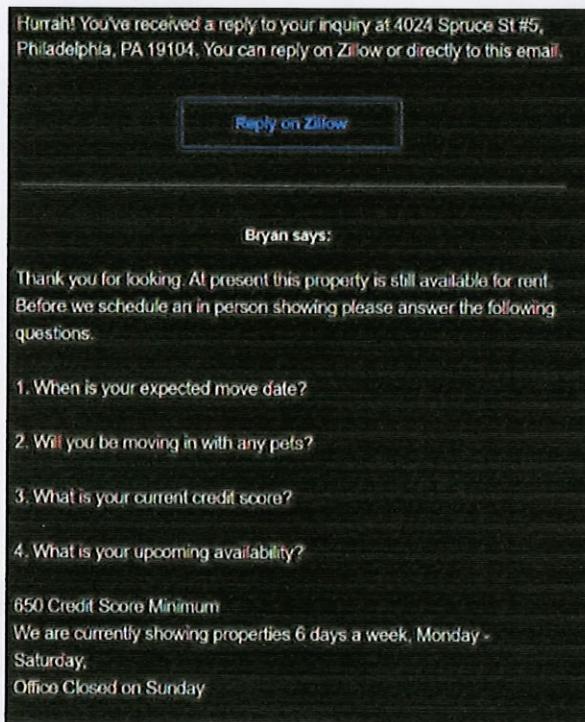
## **BACKGROUND**

16. Plaintiff incorporates by reference, as if set forth verbatim, all previous paragraphs.
17. From March 7, 2025, through March 17, 2025 Plaintiff discovered the following ads:
  - a. The ad for 425 North 41<sup>st</sup> Street<sup>1</sup> requires a minimum credit score of 650, while specifying that it is “good for one occupant only.”



<sup>1</sup> [https://www.zillow.com/homedetails/425-N-41st-St-1F-Philadelphia-PA-19104/2077025506\\_zpid/](https://www.zillow.com/homedetails/425-N-41st-St-1F-Philadelphia-PA-19104/2077025506_zpid/)

b. The ad for 4024 Spruce did not specify a minimum credit score, but a follow-up e-mail with Defendant Reese did reveal a minimum-score requirement of 650:



c. The ad for 4715 Walnut Street, placed by Defendant AMC Delancey on behalf of Defendant Delancey Verona Plaza, LLC, specified a minimum credit score requirement of 650.

The screenshot shows a Zillow listing for "Verona Plaza" located at "4715 Walnut St, Philadelphia, PA 19139". The listing includes the following details:

- Type:** Apartment building
- Bedrooms:** 1 Bed
- Bathrooms:** 1 Bath
- Features:** Studio, Pet-friendly, Shared laundry
- What's available:** Studio (1 unit available)
- Price:** \$995
- What's special:** PLEASE READ: FICO score will be reviewed. 650+ FICO required. Credit must be in good standing. Income and background requirements apply. Cosigners are considered.
- Notes:** We only require the security deposit and first month's rent to move in. No last month's rent required.
- Disclaimer:** Please contact the leasing agent for the most accurate pricing and availability. Photos are sample photos and may not reflect the exact unit available.

At the bottom of the page, there is a note: "4715-23 Walnut Street is located in the University City District of Philadelphia, nearby both the Walnut and Locust Ave neighborhoods. This is a neighborhood of mostly professionals and are historic apartment units. Building amenities include security features on the exterior and interior, an elevator, emergency maintenance platform, necessary paved parking when available on the street."

d. Defendant Greenzang Properties placed an ad on Zillow for a studio at 503 South 41<sup>st</sup> Street, which did not specify a minimum credit score, but a follow-up e-mail listed *twenty-one* properties, and a minimum credit-score requirement for each one:

**503 s 41st st apartment interest** Inbox

**Melissa Ashmen** <uleasing@greenzang...> Mar 11, 2025, 6:22PM (9 hours ago)

to me

Hello,

Thank you for your interest in renting an apartment with greenzang properties! You inquired about our units located at 503 s 41st street in University City. Please see my full apartment availability below and let me know if you would like to schedule a tour or have any questions! Listings and applications can be found on our website at [greenzang.com](http://greenzang.com)

Requirements for all rentals: \$40 app fee checking credit and background. We look for credit over 670 for each applicant and proof of income 3x the rent. If you do not have any credit/income or are between 620-670, we may consider a co-signer with good credit. Applicants with credit under 600 are typically not considered for approval for the apartments listed below.

Address	Type	Available	Rent
503 s 41st - studio	available June	\$850	
503 s 41st - studio loft	available May	\$925	
4748 pine - studio	available May	\$950	
4203 Chester - studio	available April	\$950	
4107 Chester - studio	available June	\$1035	
4205 Chester - 1 bed	available May	\$1075	
5131 hazel - 1 bed	available now	\$1095	
5103 hazel - 1 bed	available now	\$1095	
4801 pine - 1 bed	available July	\$1095	
4748 pine - 1 bed	available June	\$1175	
4203 Chester - 1 bed	available now	\$1175	
4430 pine - 1 bed	available July	\$1195	
4205 Chester - 1 bed	available now	\$1295	
5031 hazel - 2 bed 1 bath	available June	\$1325	
525 s 42nd - 1 bed	available July	\$1375	
4203 Chester - 2 bed 1 bath	now, July	\$1395	
4833 pine - 3 bed 1 bath	now, April	\$1495	
207 s 46th - 3 bed 1 bath	available now	\$1495	
4530 walnut - 3 bed 1 bath	available June	\$1575	
4827 pine - 3 bed 1 bath	available now	\$1650	
210 s Melville - 2 bed 2 bath	now	\$1650	

Individual leases and furnished bedroom option available at no extra charge for single rooms. Flexible lease starting dates! \$50-\$75 flat rate fee per person for all utilities and WiFi for units below only.

Addresses: 516, 520 and 524 s 42nd street

Leasing now for summer 2025!

\$645-\$770 per person per room (student housing)

3 bed 1 bath \$2030-\$2085 - June, July, Aug  
3 bed 2 bath \$2350 - March, April, May, June

Looking forward to hearing from you!

Thank you,  
Melissa Ashmen

**Leasing Agent**  
**Greenzang Properties**

e. Defendant 2045 Walnut Street associates placed a Zillow ad for 2045 Walnut street which specified a minimum credit-score requirement of 675:

**2045 Walnut St Apt 1C, Philadelphia, PA 19103**

**Apartment** Available Tue Apr 1, 2025 1 Bed, 1 Bath, 1 Gar.

**Condo** Shared Laundry - Parking

**Building**

**What's special**

**Windows for natural light** **Larger bedrooms** **Unit 1 has storage** **Naturalwood floors**

**Unit included:** A unique one bedroom, rarely offered in Rittenhouse / Center City, available April 1st.

Walk down the stairs into the living space with built-in storage. Hardwood floors and windows for natural light. Kitchen offers access for eating in.

Larger sized bedroom with ample closet and storage space with a bathroom attached.

**Schedule your showing today**

**Requirements:**

- No prior evictions
- No Criminal history
- Credit score 675 and above
- Make 3 times the rent for university school tuition

**Fee(s) not included:**

- on Zillow - **50** contacts

**Listed by property owner:**

**Brittney Knox** [www.newhorizonshousing.com/contact-us-in-philadelphia](http://www.newhorizonshousing.com/contact-us-in-philadelphia)

**Add a question**

f. Defendant Brittney Knox, on behalf of Defendant New Horizons, e-mailed Plaintiff in response to an inquiry about 4101 Baltimore Avenue, requiring a credit score of 625 with no prior evictions, despite the building having an open violation with L&I deemed **UNSAFE**:

Thank you for considering New Horizons Housing in your apartment search!

We have apartments available at **4101 Baltimore Avenue beginning April 2025**. If you are looking for an earlier move-in date, we have 12 other buildings available NOW!

To help us find the perfect apartment for you, please provide:

1. Your desired move-in date or time frame
2. Whether you're looking for a studio, 1-bedroom, 2-bedroom, or 3-bedroom unit
3. Your preferred monthly budget

Here is the link to our vacancy list: <https://www.newhorizonshousing.com/available-in-philadelphia>

Our entire leasing process is fully online, including the application, lease signing, and payment submission.

Here are our leasing requirements:

- \$50 non-refundable application fee
- Minimum credit score of 625 with no prior evictions (if you don't have a credit score, proof of attendance at a local university can substitute)
- First month's rent, last month's rent, and a one-month security deposit (first month will be prorated based on your move-in date)
- Proof of income (at approx. 3x rent/month)
- Co-signers/guarantors are accepted upon approval

We offer both in-person and virtual tours via Google Meet.

- **Monday-Friday** 10am-3:30pm • **Saturday** 10am-2pm
- Please schedule your tour at least 24 hours in advance by clicking here to [Book a Tour](#), replying to this email, or calling us at 215-566-1236
- **Virtual showing only Mon-Fri**

We're excited to help you find your new home!

Thank you,  
Brittney

 City of Philadelphia

**Property History**  
Permits, licenses, violations & appeals by address

An official website of the City of Philadelphia government. Here's how you know.

L&I dashboard · Property history · 4101 BALTIMORE AVE · Violation: CF-2025-010595

**UNSAFE** **IN VIOLATION**

**CASE NUMBER: CF-2025-010595**

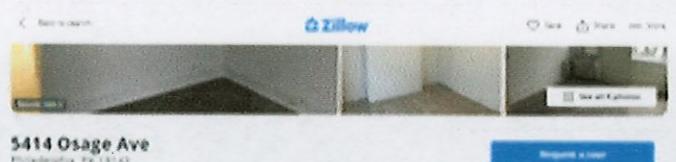
**L&I District: CENTRAL WEST**  
**OPA Account #: 881121150**  
**4101 BALTIMORE AVE**  
**Philadelphia, PA 19104-4552**

[Applicable codes index](#)

Case number	CF-2025-010595
Priority	UNSAFE
Date added	Feb 19, 2025
Date updated	Feb 19, 2025
Resolution date	Not Available
Documents*	<a href="#">Notice of Violation Report</a>

\*Violation notices on cases that complied prior to June 27, 2024 are not available here.

g. On or around March 10, 2025, Defendant Vihi Realty placed an ad on Zillow for a two-bedroom apartment for rent at 5414 Osage Avenue, for which a minimum credit score is required.



**5414 Osage Ave**  
Philadelphia, PA 19143

Request a tour Request to apply

**What's available**

This building may have units for rent or for sale. Select a unit to contact.

**Request** **Look**

**\$1,100**  
2 Bed, 1 Bath  
1,000 Sq Ft  
1st Floor

**What's special**

NO PET FEES ALLOWED • NO PET FEES ALLOWED • NO PET FEES ALLOWED  
NO PET FEES ALLOWED • NO PET FEES ALLOWED • NO PET FEES ALLOWED

MODERN APARTMENTS, APARTMENT ON THE 2ND FLOOR AT THE COAST CREEK AREA IN PHILADELPHIA. THE HOME HAS A BALKON WITH ANGLE HALLWAY STOREROOM. THE SECOND BACK BEDROOM HAS A CLOSET. THIS APARTMENT HAS A BALKON, TILE BATHROOM. THERE IS ALSO A NOSE KITCHEN AREA WITH A RANGE STOVE FOR COOKING AND CHIMNEY FOR YOUR CONVENIENCE.

THEIR IS A \$500 SECURITY DEPOSIT AND \$1000 FOR APPLICATION. NO REQUIRED THREE MONTHS OR RENT TO MOVE IN WHICH IS THE RENT, LAST AND A SECURITY DEPOSIT. THE LEASE IS A MINIMUM OF ONE YEAR LEASE. YOUR CREDIT SCORE NEEDS TO BE 600 OR HIGHER.

Edited by listing agent

Available by request  
See details

**Take a tour**

<https://www.zillow.com/b/5414-osage-ave-philadelphia-pa-98x5KC/>

h. On or around March 16, 2025, Defendant Susan Donato placed an ad on Zillow for 227 South 44<sup>th</sup> Street, which required a minimum credit score of 660:

**\$1,090/mo**  
227 S 44th St, APT 3R, Philadelphia, PA 19104  
1 beds 1 baths 450 sqft

**Cross & Room Selection**

Apartment  Available from Aug 1, 2025  No pets  
 Central air, window unit  Shared laundry  - Pet friendly  
 - Smoking

Search again to view more availability items.

**What's special**

HIGH CEILINGS, LARGE WINDOWS, HARDWOOD FLOORS, AIR CONDITIONING, CENTRAL HEAT, MODERN KITCHEN

This apartment features a spacious layout with high ceilings, large windows, and modern appliances. Features include: either with gas range, granite counter tops, high ceilings, large windows, hard wood floors, central heat and air, air conditioning, laundry and extra storage in building. High speed internet included. Rent price per month. No pets, no smoking. Available August.

**Landlord's criteria**

Get a personalized view  
Find out about yourself. You'll see if you meet the landlord's criteria as you browse.

**Criteria**

Some income per month:  \$0-\$1000 Credit score:  660+

i. On or around March 16, 2025, Defendant Kitov Realty posted an ad to Zillow, for 223 West Seymour Street, Philadelphia, PA 19144, for which prior evictions were excluded:

**\$950/mo**  
223 W Seymour St #3, Philadelphia, PA 19144  
1 beds 1 baths 800 sqft

**Cross & Room Selection**

Apartment  Available now  No pets  
 - AC  Home laundry  - Pet friendly  
 - Smoking

Search again to view more availability items.

**What's special**

CALL NOW IF YOU ARE LOOKING TO MOVE WITHIN THE NEXT MONTH!  
• RENTAL INCOME MUST BE BY THE ADULT  
• NO PETS  
• CLEAN CRIMINAL BACKGROUND  
• CREDIT BACKGROUND  
• 1ST MONTH HOLDING DEPOSIT THREE % OF THE MARKET!  
• NO APPLICATION FEE

CALL NOW TO VIEW YOUR NEW HOME!  
CALL NOW IF YOU ARE LOOKING TO MOVE WITHIN THE NEXT MONTH!  
• RENTAL INCOME MUST BE BY THE ADULT  
• NO PETS  
• CLEAN CRIMINAL BACKGROUND  
• CREDIT BACKGROUND  
• 1ST MONTH HOLDING DEPOSIT THREE % OF THE MARKET!  
• NO APPLICATION FEE

Call Now To View Your New Home!  
... at 20th 29 minutes

**Listed by Listing agent**

[https://www.zillow.com/homedetails/223-W-Seymour-St-3-Philadelphia-PA-19144/2096998750\\_zpid/](https://www.zillow.com/homedetails/223-W-Seymour-St-3-Philadelphia-PA-19144/2096998750_zpid/)

18. Each of the above advertisements specifies a minimum credit score, while Defendant New Horizons requires no prior evictions and has open code violations.

**Standing**

19. Plaintiff has standing to sue as he is disabled and older (over forty), and is a prospective tenant who also has a caregiver (his brother, who is paid for several hours a day to assist him). Because the defendants placed illegal ads, Plaintiff has standing to sue as an aggrieved party under the Renters Access Act, and as a prospective tenant under the Fair Housing Act.

**COUNT ONE: FAIR HOUSING ACT DISCRIMINATION (DISABILITY) (ALL Ds)**

20. Plaintiff incorporates by reference, as if set forth verbatim herein, the entire contents of all previous paragraphs.

21. Under Texas Department of Housing and Community Affairs v The Inclusive Communities Project, 576 US 519, disparate-impact claims are allowed under the Fair Housing Act, in this case 42 USC § 3604(f)(1), where the bogus credit-score requirement constitutes a refusal to rent to the otherwise-qualified, financially sound Plaintiff and his brother/caregiver.<sup>2</sup>

22. Defendants' minimum credit-score requirements of 650 creates a disparate impact that discriminates against the disabled with scores under 650, such as Plaintiff's current score of 575. The disabled, like Plaintiff, have historically lower credit scores secondary to their disability.

23. Each Defendants' minimum credit-score requirement is illegal *per se* under the Renters Access Act of 2019, and *prima facie* evidence of disparate-impact discrimination against the disabled.

24. Defendants' conduct, as set forth hereinabove, including but not limited to the ads set forth earlier, constitute separate violation of 42 USC § 3604(f)(1) of the Fair Housing Act; Plaintiff states this claim for relief against all Defendants.

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<sup>2</sup> See also 24 C.F.R. § 100.202 – HUD's regulations expanding on disability discrimination

25. Defendant Zillow is liable for allowing the ads to run on its website or via followup mail.

Zillow is not immune under Section 230 as they are an active property-management company who is a full participant and partner in the creation and dissemination of the illegal ads. Craigslist, by contrast, would be immune.

26. Additionally, Defendants PanPhil, Wei, and Wang's ad for the 41<sup>st</sup> Street apartment also violates § 3604(f)(1), by precluding having a live-in caregiver.

27. Plaintiff has no criminal record, owes no back rent to anyone, has never missed a rent payment in his life, has an after-tax income of nearly double the rent for the studio on his own, and four to seven times the rent with his brother/caregiver, who would eventually take over the apartment.

28. Plaintiff is entitled to compensatory and punitive damages, in an amount to be determined at trial. He is also entitled to costs of suit, attorney fees (if accrued, none so far), and injunctive or declaratory and such other relief deemed necessary to make him whole.

#### **COUNT TWO: RENTERS ACCESS ACT VIOLATIONS (ALL DEFENDANTS)**

29. Plaintiff incorporates by reference, as if set forth verbatim herein, the entire contents of all previous paragraphs.

30. Defendants' conduct, as set forth hereinabove, is a *prima facie* violation of §9-810 of the Renters Access Act, which explicitly prohibits using a minimum credit score in a rental ad, with damages occurring upon publication. Plaintiff, as a prospective tenant actively seeking new housing, is aggrieved by the conduct and has clear standing to sue for statutory damages, as follows:

- a. Defendant Kitov Realty, LLC for banning all prior evictions.
- b. All other Defendants for having a minimum-credit-score requirement.
- c. Defendants Wei, Zang, and PanPhil for requiring only one occupant.

31. Each Defendant is liable for the ads it placed, while Defendant Zillow is equally liable for publishing the ads and profiting from them.

32. Under the Renters Access Act, Plaintiff is entitled to \$2,000.00 in statutory damages per illegal listing. He is further entitled to punitive damages, costs, attorney fees (none accrued so far), and such other relief as deemed necessary to make him whole.

**Prayer For Relief**

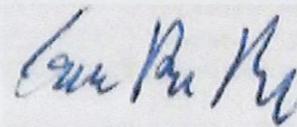
For each violation, from each defendant, or in combination for all defendants, Plaintiff seeks the following relief:

1. An amount to be determined at trial for statutory damages for violations of the Renters Access Act, but which is at least \$174,000.00, as follows:

<b><u>Defendant</u></b>	<b><u>Violations</u></b>	<b><u>Damages</u></b>
Kitov	1	2,000.00
Donato	1	2,000.00
Panhil	2	\$ 4,000.00
AMC Delancey	2	4,000.00
Allegiance	2	4,000.00
Anchor	2	4,000.00
New Horizons	12	24,000.00
Greenzang	21	42,000.00
Zillow	43	86,000.00

2. Compensatory damages in an amount to be determined at trial.
3. Injunctive relief sufficient to terminate the actionable conduct.

This the 18<sup>th</sup> day of March, 2025.



**Gordon Roy Parker, Pro Se**  
 315 South Broad Street, #0106  
 Philadelphia, PA 19107  
 gordonroyparker@gmail.com  
 (215) 951-4131

\*e-mail or text preferred contact